

FILED

JAN 20 2023

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY [Signature] 2/2/23

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

ROBERT WHITE,

Plaintiff,

v.

PATRIOT ERECTORS LLC,

Defendant.

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1:20-CV-1219-RP

**VERDICT FORM**

**Part 1: Racial Discrimination**

**Question No. 1**

Has Plaintiff White proved that he has suffered an adverse employment action from Patriot Erectors?

Answer Yes or No: yes

If your answer is "Yes," answer the next question. If your answer is "No," do not answer the next question.

**Question No. 2**

Has Plaintiff White proved that he would not have suffered the adverse employment action in the absence of—in other words, but for—his race?

Answer Yes or No: yes

**Part 2: Retaliation**

**Question No. 3**

Has Plaintiff White proved that he has suffered an adverse employment action from Patriot Erectors?

Answer Yes or No: yes

If your answer is "Yes," answer the next question. If your answer is "No," do not answer the next question.

**Question No. 4**

Do you find that Plaintiff White would not have suffered the adverse action found in Question 3 but for his complaint to human resources?

Answer Yes or No: No

If you answered "Yes" to Question 2 OR answered "Yes" to Question 4, proceed to the next section. If you answered "No" to Question 2 AND "No" to Question 4, do not proceed to the next section (for the purposes of determining how to proceed, leaving a question blank is the same as answering "No").

**Part 3: Damages**

**Question No. 5**

What sum of money if paid now in cash, would fairly and reasonably compensate Plaintiff White for the damages, if any, you have found Defendant Patriot Erectors caused Plaintiff White?

Answer in dollars and cents for the following items and none other:

1. Damages, if any, in the past for emotional pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life.

\$ 0

2. Damages, if any, in the future for emotional pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life.

\$ 0

3. Wages and employment benefits, if any, from November 1, 2019, to the date of verdict.

\$ 213,930.00

**Question No. 6**

Do you find that Plaintiff White failed to reduce his damages through the exercise of reasonable diligence in seeking, obtaining, and maintaining substantially equivalent employment after the date of his resignation?

Answer "Yes" or "No."

No

If your answer is "Yes," answer the next question. If your answer is "No," do not answer the next question.

**Question No. 7**

How much would Plaintiff White have earned had he exercised reasonable diligence under the circumstances to minimize his damages?

Answer in dollars and cents, if any.

\$ \_\_\_\_\_

**VERDICT OF THE JURY**

We, the jury, have unanimously agreed to the answers to the attached questions and return such answer in open court, and under the instructions of the Court, as our verdict in this cause.

SIGNED this 20 day of January, 2023.

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ORIGINAL SIGNATURE  
REDACTED PURSUANT TO  
E-GOVERNMENT ACT OF 2002